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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION IN  
LIMINE NO. 16**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal information in its September 16, 2017 Motion *in Limine* No. 16 and exhibits thereto (the  
 8 “Administrative Motion” or “Waymo’s Motion”), as well as Defendants’ response and exhibits  
 9 thereto. The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit A to Waymo’s Motion	Portions highlighted in red	Waymo
Exhibit F to Waymo’s Motion	Portions highlighted in red	Waymo
Portions of Otto Trucking’s Opposition to Waymo’s Motion in Limine No. 16 (“Otto Trucking’s Opposition”)	Portions highlighted in green	Waymo
Exhibit 5 to Otto Trucking’s Opposition	Portions in green	Waymo
Exhibit 6 to Otto Trucking’s Opposition	Portions in green	Waymo
Exhibit 7 to Otto Trucking’s Opposition	Portion in green	Waymo

20       3. The Court should seal the portions of Waymo’s Exhibits A, F, portions of Otto  
 21 Trucking’s Opposition, and Otto Trucking Exhibits 5-7 because they contain or refers to Waymo’s  
 22 asserted trade secrets, which Waymo seeks to seal. I understand that this information is maintained as  
 23 secret by Waymo (Dkt. 25-47) and is valuable as trade secret to Waymo’s business (Dkt. 25-31). The  
 24 public disclosure of this information would give Waymo’s competitors access to in-depth  
 25 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. The  
 26 public disclosure of this information would give Waymo’s competitors access to Waymo’s own in-  
 27 depth analysis of its business, and if such information were made public, I understand that Waymo’s  
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1 competitive standing would be significantly harmed. Waymo's request to seal is narrowly tailored to  
2 only the confidential information.

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4 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
5 true and correct, and that this declaration was executed in San Francisco, California, on September 13,  
6 2017.

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By /s/ Lindsay Cooper

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Lindsay Cooper  
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Attorneys for WAYMO LLC

## **SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven